

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MELANIE ALFORD,)
Plaintiff,)
)
v.)
)
WONDERLAND MONTESSORI)
ACADEMY, LLC)
Defendant.) Civil Action No: 3:23-cv-00464-D

PRETRIAL DISCLOSURES FOR PLAINTIFF MELANIE ALFORD

TO THE UNITED STATES DISTRICT COURT,
SIDNEY A. FITZWATER, SENIOR JUDGE

Plaintiff Melanie Alford, makes the following pretrial disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure:

A. WITNESSES:

Plaintiff Melanie Alford
c/o Lurlia Oglesby
Oglesby & Oglesby Ltd.
618 W. Washington
Sandusky, OH 44870
469-878-9747

Lisa Welch
2652 Via Sonoma
Carrollton, TX 75006
214-487-1752

Rachel Amoaf
18949 Marsh Lane, #109
Dallas, TX 75287
214-281-0289

Stacy Bigby
351 Granger Circle
Lantana, TX 76226
972-679-7074

Zeenat Noorani
1834 East Peters Colony Rd., Apt 1
Carrollton, TX 75007
469-262-8259

Kathy Jimani
2977 Saint Andrews Drive
Lewisville, TX 75067
469-450-2152

Shannon Blackwell
4801 Valley Springs Trail
Keller, TX 76244
214-707-8329

B. DEPOSITIONS:

In the event of her legal unavailability to testify:

Stacy Bigby, by stenographer
351 Granger Circle
Lantana, TX 76226
972-679-7074

C. EXHIBITS:

Alford Bates documents 002 through 0050
Plaintiff's Appendix to Response to MSJ 1-6, 21-30

Respectfully submitted,

/s/Lurlia A. Oglesby (0022572)

Oglesby and Oglesby
618 W. Washington
Sandusky, Ohio 44870
469-878-9747
lawoffice@rboglesby.com
Attorney for Plaintiff

Certificate of Service

On this 4th day of October, 2024, a true and correct copy of the above and foregoing document was served on counsel for the Defendant pursuant to the Federal Rules of Civil Procedure.

/s/Lurlia A. Oglesby
Lurlia A. Oglesby

INITIAL DISCLOSURES

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE: Melanie Alford
c/o Lurlia A. Oglesby
Oglesby & Oglesby
618 W. Washington
Sandusky, Ohio 44870
Plaintiff with knowledge of her employment, job performance, employer biases, furlough, and her termination.

Sanjay Joshi
c/o Christian P. Shippee
Touchstone Bernays
1717 Main Street, Suite 3400
Dallas, Texas 75201
214-741-1166
Chief Operating Officer with knowledge of communications from Alford.

Kathy Jiwani
c/o Christian P. Shippee
Touchstone Bernays
1717 Main Street, Suite 3400
Dallas, Texas 75201
214-741-1166
Carrollton Head of School with knowledge of employee furloughs, Plaintiff's job performance, and Plaintiff's termination.

Karen Jiwani
c/o Christian P. Shippee
Touchstone Bernays
1717 Main Street, Suite 3400
Dallas, Texas 75201
214-741-1166
Office Assistant who worked at Carrollton campus who may have knowledge of communications with Plaintiff.

Shannon Blackwell
Address unknown
Telephone number unknown
Former Director of Community Relations and former Executive Director with knowledge of employee furloughs, Plaintiff's job performance, Plaintiff's furlough, Plaintiff's termination, and communications with Plaintiff.

Pavithra Rajendran
Address unknown
Telephone number unknown
Former Human Resources Generalist with knowledge of employee furloughs, Plaintiff's furlough, and Plaintiff's termination and who may have knowledge of communications with Plaintiff.

Stacy Bigby
Address unknown
Telephone number unknown
Former Director of Operations with knowledge of employee furloughs, Plaintiff's job performance, and Plaintiff's termination.

Teresa Aquino
Address unknown
Telephone number unknown
Former Education Director with knowledge of employee furloughs, Plaintiff's job performance, and Plaintiff's termination.

Rachel Amoaf
Address unknown
Telephone number unknown
Classroom Assistant who may have knowledge of communications with Plaintiff.

Lisa Welch
Address unknown
Telephone number unknown
Former Carrollton Office Manager or Assistant Head of School who may have knowledge of communications with Plaintiff.

Supreet Kaur

Address unknown
Telephone number unknown
Former Director of Human Resources with knowledge of Plaintiff's prior charge of discrimination.

Sonia Kholi
Address unknown
Telephone number unknown
Former teacher at Valley Ranch campus who may have knowledge of communications or interactions with Plaintiff related to prior charge of discrimination.

(ii) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

RESPONSE: EEOC documents; furlough and layoff letter; electronic mail communications between and among those listed in (i) above.

(iii) A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE: Specific amount is undetermined at this time; however, Plaintiff will be claiming damages allowable under the law.

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE: None.